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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 AYNUR KABOTA, an individual,
16 Plaintiff,

17 vs.

18 EDUVISION, INC., dba ARIZONA COLLEGE,
19 a foreign corporation domiciled in Missouri;
20 SENTINEL PEAK CAPITAL, LLC., dba
21 ARIZONA COLLEGE, a Delaware Limited
22 Liability Company; DIANE THOMASON, an
23 individual; DANIEL J. NAVARRO, an
24 individual; PATRICIA T. ALPERT, an
25 individual; MARIE HALLINAN, an individual,
26 Defendants.

Case No.: 2:19-cv-01497-JAD-VCF

**STIPULATION AND
ORDER FOR PLAINTIFF TO RESPOND
TO DEFENDANTS' PARTIAL MOTION
TO DISMISS COMPLAINT**

(Second Request)

ECF No. 28

24 COME NOW Plaintiff AYNUR KABOTA ("Plaintiff"), by and through her counsel,
25 Raelene K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, and Defendants,
26 EDUVISION, INC., dba ARIZONA COLLEGE, DIANE THOMASON, DANIEL J.
27 NAVARRO, PATRICIA T. ALPERT, and MARIE HALLINAN, by and through their counsel,
28 Bruce C. Young, Esq. of the law firm Lewis Brisbois Bisgaard & Smith LLP, and hereby

request that the Court extend the deadline for Plaintiff to respond to *Defendants' Partial Motion to Dismiss Complaint* ("Motion") from **Tuesday, January 14, 2020 to Wednesday, January 15, 2020**, and to extend the deadline for Defendants to reply in support of the *Motion* from **Tuesday, January 21, 2020 to Wednesday, January 29, 2020**. This extension of time is being requested, because Plaintiff's counsel needs one additional day to respond to the motion due to intervening matters in the previous week involving other cases, including multiple unscheduled telephone calls from a mediator with the Ninth Circuit Court of Appeals; and Defendants' counsel will be out of the office for the upcoming holiday on January 20, 2020 and anticipates the complexity of Plaintiff's arguments against dismissal will require additional time to respond.

This is the parties' second request to extend this deadline. The parties submit that this request is not for the purpose of undue delay but is made due to the caseload and calendaring issues described above. Furthermore, the motion hearing scheduled for February 10, 2020, will not be affected by this extension.

DATED this 14th day of January 2020.

THE PALMER LAW FIRM, P.C.

By: / s / **Raelene K. Palmer, Esq.**

Raelene K. Palmer, Esq.
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DATED this 14th day of January 2020.

By: / s / **Robert S. Melcic, Esq.**

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Attorneys for Plaintiff
Aynur Kabota

DATED this 14th day of January 2020.

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: / s / **Bruce C. Young, Esq.**

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ALPERT, AND MARIE HALLINAN

IT IS SO ORDERED.


U.S. District Court Judge 1-15-2020